

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020-63-E

IN RE: Bridgestone Americas Tire)	
Operations, LLC,)	
Petitioner,)	MOTION FOR PROTECTIVE ORDER
v.)	
Dominion Energy South Carolina,)	
Inc.)	
Respondent.)	
)	

Bridgestone Americas Tire Operations, LLC (“BATO”) hereby moves the South Carolina Public Service Commission for an order treating as confidential the version of the direct testimony of Derrick Freeman and Edward G. McGavran, III, PE filed herein as confidential. The testimony of these witnesses discusses the quantities and cost of electricity purchased from Dominion Energy South Carolina (“DESC”) which constitutes confidential and strictly proprietary information. The public disclosure of these details may result in direct, immediate and substantial harm to the competitive position of the Petitioner in South Carolina and elsewhere. As such, the testimony in question contains a “trade secret” as that term is used in South Carolina Trade Secrets Act, S. C. Code § 39-8-20(5) and is otherwise protected by law.

WHEREFORE, the Petitioner respectfully requests that the South Carolina Public Service Commission grant this Motion for Protective Treatment with respect to the confidential and

proprietary information contained in the testimony in question. The petitioner is filing herewith public copies of the redacted confidential testimony.

Respectfully submitted, this the 9th day of June, 2020.

/s/ Scott Elliott

Scott Elliott, Esquire
ELLIOTT & ELLIOTT, P.A.
1508 Lady Street
Columbia, SC 29201
Telephone: 803-771-0555; Fax: 803-771-8010
selliott@elliottlaw.us

Attorney for Petitioner